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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LAVANZ CROSBY and ANDREANAI HALL,
individuals,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS on relation of
the NORTH LAS VEGAS POLICE
DEPARTMENT, a political subdivision of
the State of Nevada; CLARK COUNTY on
relation of the NORTH LAS VEGAS
CONSTABLE'S OFFICE, a political
subdivision of the State of Nevada; MIKE
CARMODY, individually; DELGADO
LOPEZ, individually; MICHAEL
MORRISON, individually; JENSIA
MANGUAL, individually; THANH LEE,
individually; DOES I-V, inclusive,

Defendants.

Case No: 2:24-cv-00880-RFB-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER BY AND BETWEEN
PLAINTIFFS AND DEFENDANTS
CLARK COUNTY, MIKE
CARMODY, AND DELGADO
LOPEZ TO (1) WAIVE SERVICE OF
PROCESS AND TO (2) EXTEND
TIME FOR FILING AN ANSWER
OR DISPOITIVE MOTION IN
RESPONSE TO PLAINTIFFS'
COMPLAINT [1]**

(First Request)

It is stipulated by and between the undersigned parties individually or through their
respective attorneys, that:

1. Defendants CLARK COUNTY on relation of the NORTH LAS VEGAS
CONSTABLE'S OFFICE, a political subdivision of the State of Nevada ("Clark

County”), MIKE CARMODY (“Carmody”), and DELGADO LOPEZ (“Lopez”) hereby waive service of Plaintiffs’ Complaint [1] and proposed summonses [4], [5], [8].

2. Defendants CLARK COUNTY, CARMODY, and LOPEZ may have 60 days from June 17, 2024 (August 16, 2024) to file an answer or dispositive motion in response to Plaintiffs’ Complaint [1];

3. This is the first extension of time requested; and,

4. In support thereof,

a. CLARK COUNTY, CARMODY, and LOPEZ represent that they have requested representation and defense in this matter from their professional liability insurer and are awaiting a response;

b. CLARK COUNTY, CARMODY, and LOPEZ dispute that service of Plaintiffs’ summons and complaint was proper, but have agreed to waive service of the summonses and complaint and forgo their right to object to Plaintiffs’ service of process;

c. The request for an extension of 60 days to file a response is consistent with the time allowed to file an answer or dispositive motion in response to Plaintiffs’ Complaint had CLARK COUNTY, CARMODY, and LOPEZ waived service pursuant to FRCP 4(d); and,

d. Plaintiffs do not object to the request as a professional courtesy while the above-named defendants await a response from their insurance carrier.

DATED this 20th day of June, 2024.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

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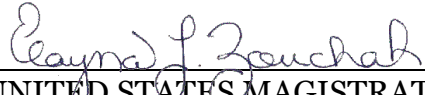
/s/ Adam J. Breeden
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/s/ Michael Carmody
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Michael Morrison, and Jensia
Mangual*

Order

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: June 20, 2024